Remarks

Reconsideration of this Application is respectfully requested.

Claims 1, 4-17 and 88 are pending in the application, with claim 1 being the independent claim. Claims 2-3, 18-87 and 89-92 were previously cancelled.

Based on the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 103

Claims 1, 5, 9-13, 15, 17, and 88 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,266,666 to Ireland et al. ("Ireland") in view of U.S. Patent No. 6,269,336 to Ladd *et al.* ("Ladd"). Applicants respectfully traverse the rejection and request that it be withdrawn.

Ireland and Ladd, alone or in combination, do not teach each and every element of claim 1. For example, Ireland does not disclose or suggest, among other things, "a multi-database client that manages each service module's access to at least one database client," as recited in amended claim 1. Ireland also does not disclose "a database access manager that monitors each service module's access to the multi-database client," as recited in amended claim 1.

In rejecting claim 1, the Office Action implicitly equated the Java Transaction Service (JTS) and Jaguar CTS of Ireland to a service module and a multi-database client of the current application, respectively. Office Action, at p. 2. According to Ireland, the Jaguar CTS is an exemplary embodiment of a component transaction server (CTS). See, e.g., Col. 6, lines 63-65. The CTS uses the JTS to coordinate transactions. See, e.g.,

Col. 7, lines 48-60; Fig. 2. The JTS of Ireland actually refers to a "Java enterprise service based on the Open Group Distributed Transaction Processing (D-TP) standard."

Col. 7, lines 53-60. In this way, clients of Ireland are configured to access the back end database server using a transaction coordinator. *Id.* As such, the JTS is not used to access at least one database client, and the CTS is not configured to manage the JTS' access to the database client as in the claimed invention. Accordingly, Ireland fails to disclose at least "a multi-database client that manages each service module's access to at least one database client," as recited in amended claim 1.

In the rejection of claim 1, the session management module (SMM) of Ireland was equated with a database access manager of claim 1. Office Action, at p. 2. According to Ireland, the SMM maintains a pool of communications sessions and allocates them to clients as needed. See, e.g., Col. 7, lines 37-41; and Fig. 2. Nowhere in Ireland is the SMM being described to monitor the JTS' access to the CTS. As previously discussed, the JTS does not actually access the CTS. Instead it is a form of standard used by the CTS' transaction coordinator. See Col. 7, lines 54-60. Further, the SMM is used to allocate communication sessions to thin clients such as JAVA and Active X for accessing the database servers. See Fig. 2. As such, the SMM of Ireland is not used to monitor the JTS. Accordingly, Ireland fails to disclose "a database access manager that monitors each service module's access to the multi-database client," as recited in claim 1.

Ladd does not teach or suggest any of these features missing from Ireland. Thus Ladd does not cure the deficiency of Ireland. Therefore, claim 1 is patentable over Ireland and Ladd, alone or in combination, for at least the reasons provided above.

Claims 5, 9-13, 15, 17, and 88 depend from claim 1 and are patentable over Ireland and Ladd, taken alone or in combination, for at least the reasons provided with respect to claim 1, and further in view of their own respective features.

Claims 4 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ireland in view of Ladd and in further view of U.S. Patent No. 6,321,276 to Donaldson ("Donaldson"). Claims 6-8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ireland in view of Ladd and in further view of U.S. Patent No. 6,023,684 to Pearson ("Pearson"). Claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Ireland in view of Ladd and in further view of U.S. Patent No. 5,854,835 to Montgomery *et al.* ("Montgomery"). Applicants respectfully traverse all of these rejections, and request that the Examiner reconsider and withdraw the rejections.

Claims 4, 6-8, 14, and 16 depend from claim 1. The disclosures of Donaldson, Pearson, and Montgomery add nothing to the disclosure of Ireland and Ladd to overcome the deficiencies of Ireland and Ladd with respect to claim 1. Claims 4, 6-8, 14, and 16 are therefore patentable over the Examiner's several combinations of references for at least the reasons presented above. Applicants therefore request that the Examiner reconsider and withdraw the rejection of claims 4, 6-8, 14, and 16.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

Michael V. Messinger

Attorney for Applicants Registration No. 37,575

•

Date: ____3//3

1100 New York Avenue, N.W. Washington, D.C. 20005-3934 (202) 371-2600

507114